



Mike Saperstein

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NOTICE OF EX PARTE

October 3, 2016

VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

Re: *Investigation of Certain Price Cap Local Exchange Carrier Business Data Services
Tariff Pricing Plans, WC Docket No. 15-247; Special Access Rates for Price Cap Local
Exchange Carriers, WC Docket No. 05-25 and RM-10593; Business Data Services in an
Internet Protocol Environment, WC Docket No. 16-143*

Dear Ms. Dortch:

On September 29, 2016, Kathleen Abernathy, Executive Vice President of External Affairs for Frontier Communications, and Bryan Tramont of Wilkinson Barker Knauer, LLP, met with Matthew DelNero, Chief of the Wireline Competition Bureau, to discuss the proceeding referenced above. Frontier urged the Commission to fully consider the disparate impacts that would occur if the Commission instituted a uniform rate reduction for business data services ("BDS") across providers with differing business models and revenue streams, particularly those ILECs that lack wireless or significant CLEC operations. Frontier described the need for the Commission to consider a transition period for any BDS rate reductions affecting mid-size ILECs. Frontier also described the competitive state of the Ethernet market and its position that no further regulation is necessary at this time.

Please contact me with any additional questions.

Sincerely,

/s/

Mike Saperstein

cc: Matt DelNero